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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

MELVIN LOWE,

Plaintiff/Petitioner,

Vs.

CIVIL ACTION NO.
2:05-CV-0495

MONTGOMERY COUNTY BOARD
OF EDUCATION,

Defendant/Respondent.

* * * * *

DEPOSITION OF QUESHA STARKS, taken
pursuant to stipulation and agreement before
Patricia G. Starkie, Registered Diplomate Reporter,
CRR, and Commissioner for the State of Alabama at
Large, in the Law Offices of Hill, Hill, Carter,
Franco, Cole & Black, 425 South Perry Street,
Montgomery, Alabama, on Tuesday, January 24, 2006,
commencing at approximately 10:15 a.m.

* * * * *

Blumberg No. 5137

43

1 last name?

2 THE WITNESS: A-U-D-E.

3 Q. Have you ever been certified as a reading
4 coach?

5 A. No. I'm secondary.

6 Q. Okay. Have you ever worked in any
7 elementary schools or middle schools?

8 A. Well, no, because Bullock County High
9 School, you know -- not in Montgomery
10 County. That's 7 through 12.

11 Q. That was 7 through 12?

12 A. Uh-huh (positive response). Now, junior
13 high school is McKee, you know, as
14 assistant principal, but not as a teacher.
15 That's junior high.

16 Q. All right. So your current position at BTW
17 is your first term as a -- first time
18 serving as principal?

19 A. Second year -- oh --

20 Q. But in that position, you've never been a
21 principal anywhere before BTW?

22 A. No.

23 Q. And what process did you go through to

1 obtain the principal position at BTW?

2 A. Well, it took a long time because I
3 certified in 1998 as an administrator, and
4 I did not make it as soon as I certified.
5 So I went back into the classroom, and
6 that's when I got the national board
7 certification. So it's taken a while
8 because I certified in 1998, but I didn't
9 get my first job, you know, as a -- you
10 know, an administrator or principal until
11 2003-2004.

12 Q. Okay. But, now, you had an assistant
13 principal position in 2001 at Loveless and
14 Brewbaker Tech at the same time?

15 A. Okay. And let me retrace this. Let me
16 kind of go back over it because -- I would
17 have brought my resume.

18 Okay. So for 2003-2004, I was
19 assistant principal at BTW -- I mean -- I'm
20 sorry. That was --

21 MS. CARTER: I think she might be
22 one year off.

23 A. Yeah, I'm about one year off.

1 A. Well, when I was hiring -- when we were
2 trying to find an assistant principal to
3 fill the slot at my school, so --

4 Q. How many people were on this committee?

5 A. It was basically all of the principals who
6 were looking for an assistant principal, so
7 there had to have been maybe about seven
8 people in that room.

9 Q. And what year was this that you were
10 looking for an assistant principal?

11 A. I was looking for an assistant principal
12 2004-2005, the summer, so that would be
13 2004. Summer 2004.

14 Q. Okay.

15 A. That was the first time I was looking
16 for --

17 Q. So that was --

18 A. Yes.

19 Q. And you did an application process the
20 following year, summer of 2005?

21 A. I was looking for someone then, too.

22 Q. Okay.

23 A. So I sat in on two interviews.

1 Q. Okay.

2 A. And in going back to that, in tracing
3 things, I want to --

4 Is it okay for me to go back?

5 Q. Yes.

6 A. With Dan Aude, he interviewed me for the
7 assistant principalship at BTW.

8 Q. Okay.

9 A. Okay. Not the principalship. MPS did the
10 principalship.

11 Q. Okay. In your experience as principal, has
12 there ever been a time when you've
13 recommended a candidate for a position and
14 that candidate not be hired?

15 A. Basically -- and it's hard to say that
16 because we are asked to submit
17 recommendations, our first, second, and our
18 third choices. And, you know, all of my
19 choices are pretty much, you know, I would
20 be okay with either one of them. So I
21 can't say that, no, they've been denied.
22 It just depends. And then I remember one
23 year when I was interviewing, there may

1 have been some individuals who were
2 currently in the classroom and couldn't be
3 pulled out. That was the 2004-2005 year.

4 So no, not really, because, you know,
5 we're given an opportunity to make
6 recommendations, and I would have been fine
7 with either of the recommendations for
8 2005-2006.

9 Q. Okay. You say either of the
10 recommendations. Did you make two
11 recommendations?

12 A. I did three.

13 Q. Three?

14 A. Uh-huh (positive response).

15 Q. Do you ever indicate to Mr. Barker or
16 anyone at HR who is your preferred amongst
17 the three?

18 A. Yes, I can indicate, yes, and that would be
19 in my ranking. But still, going back to
20 what I said, I would be fine with either of
21 the three.

22 Q. Right.

23 A. Uh-huh (positive response).

1 because PEPE is one of our biggest
2 monsters. Teacher evaluations, seeing if
3 individuals are competent to do that. And
4 also interpersonal skills, working with
5 faculty members. That's the largest part.
6 Background experience. I'm on the
7 secondary level, so I'm going to be looking
8 for some individuals who have had some sort
9 of experience on the secondary level,
10 successful experience.

11 Q. Let's talk about the 2005 assistant
12 principal position specifically.

13 A. Right.

14 Q. Okay. Did Melvin Lowe express an interest
15 in this position?

16 A. He called me, yes. He called, expressed an
17 interest in it.

18 Q. Did he call you prior to the MPS interview?

19 A. No.

20 Q. So what was your first interaction with
21 Melvin Lowe?

22 A. With our telephone call, our conversation.
23 And I'm going back to -- this may have been

1 June, July or whatever. Some of the
2 applicants were called. Some of the people
3 who interviewed with MPS followed up with
4 us. My first time really talking to him
5 jobwise was in our interview.

6 Q. You say our interview?

7 A. Yes. My interview with Mr. Lowe.

8 Q. You and Mr. Lowe?

9 A. Uh-huh (positive response).

10 Q. Did Mr. Lowe participate in the group
11 committee interview?

12 A. Yes, I remember seeing him.

13 Q. Okay. Do you remember what your impression
14 was of him based on that group interview?

15 A. The group interview, you know, we had so
16 many applicants. I'm not saying that he
17 wasn't a good applicant, but, again, I'm
18 looking for three things, you know:
19 Exposure to the magnet performing arts, and
20 then secondly looking at background
21 experience, education, what level the
22 person has served on. So I can't say that
23 he was in my top grouping from those

1 individuals that I interviewed at MPS.

2 Q. How many applicants were there at that
3 interview at MPS, do you know?

4 A. I can not give you an estimate.

5 Q. Fifty? I mean, I'm just trying -- was it
6 10, 50, 100?

7 A. In that single day that I was there, there
8 had to have been over 10, 15 people.

9 Q. Okay. Were there other days where the
10 principals did group interviews?

11 A. There were other days. I think we had
12 about maybe two sessions, and I know that I
13 wasn't available for one of the sessions.

14 Q. Do you know approximately the size of the
15 applicant pool that you were going to be
16 picking this position from?

17 A. No.

18 Q. Okay. Now, you said that Melvin Lowe
19 contacted you after the MPS group
20 interview?

21 A. And let me put it out here like this
22 because, you know, I said I don't want to
23 give you any information that's incorrect.

1 If we go down the listing and we contact a
2 person, you know, they can contact us back.

3 Q. Okay.

4 A. I do remember him contacting me, but I
5 don't know if it was that he contacted me
6 after, you know, the individuals were
7 called.

8 Q. So you don't know if your office initiated
9 the first contact or if he did?

10 A. I can't say that.

11 Q. Okay.

12 A. You know, I can't say that.

13 Q. That's fine. Did you and he have a
14 conversation on the phone when he contacted
15 your office?

16 A. It was just short.

17 And Sharon Gjesvold did my scheduled
18 interviews. She was --

19 Q. What was her last name?

20 A. Gjesvold. G-J-E-S-V-O-L-D. She's my
21 bookkeeper. She scheduled most of my
22 summer appointments.

23 Q. Did Mr. Lowe come in for a face-to-face

1 interview?

2 A. Yes.

3 Q. And what was your impression of that
4 interview?

5 A. Well, I remembered Mr. Lowe. You asked did
6 I have any prior knowledge of him. I
7 remembered him because when we were
8 younger, we had the same piano teacher. So
9 of course, at the beginning of the
10 interview, we had a little small talk.
11 Okay, yeah, I remember you. But he pretty
12 much took charge of the interview. He
13 carried it on. I was able to ask a couple
14 of questions, but he pretty much led the
15 interview.

16 Q. Okay. How long was that interview, do
17 you --

18 A. That one that day could have been about 30,
19 35 minutes.

20 Q. And what all did y'all talk about over the
21 course of the interview?

22 A. Well, he talked about his background. He
23 shared background information about

1 being -- working in productions, serving as
2 a make-up artist, his elementary
3 experience, working in Bullock County
4 also. And basically, I heard a lot about,
5 you know, him.

6 My questions centered on organizational
7 skills, how do you work well with people,
8 interpersonal skills, but we kind of went
9 off on different tangents about his
10 experience and where he had been and what
11 individuals he had an opportunity to work
12 with and what he had accomplished in his
13 previous jobs. So it really wasn't a
14 structured interview like I initially
15 wanted it to be. It was more
16 conversational as to what I have achieved,
17 this is what I have done, and I have -- I
18 will be getting my doctorate from Nova and
19 just a couple of other things.

20 Q. Based on what you did speak to him about,
21 did you form an opinion based on whether or
22 not he had the qualities that you were
23 looking for, the organizational skills?

1 Did he have organizational skills
2 sufficient to fulfill this position?

3 A. Well, I really couldn't, like I say, form
4 an opinion about him at that particular
5 time because the conversation went away
6 from my interview questions to this is who
7 I am. This is what I can do for your
8 program.

9 Q. Okay.

10 A. So until I could look at all of the
11 applicants grouped together, I can't say,
12 okay, well, this is the one I'm going to
13 hire right now.

14 Q. Right. Did you walk away from that
15 interview with any kind of opinion that you
16 can recall?

17 A. Nothing other than, okay, at least he can
18 entertain us with a lot of good
19 conversation. But nothing as to this is
20 going to be the person who I want for the
21 job.

22 Q. Okay.

23 A. No.

1 Q. Now, what kind of certification would be
2 required for this position?

3 A. An administrative certification. And to
4 have that, you have to have completed a
5 course -- your four years and then the
6 master's program, and this is like five
7 classes or more after the master's
8 program. So having an administrative
9 certificate for K through 12, those are the
10 requirements.

11 Q. Are you aware of whether or not Mr. Lowe
12 possesses or possessed at that time an
13 administrative certificate?

14 A. For him to be in the interview with us at
15 central office, I assumed.

16 Q. Okay.

17 A. But, you know, other than that, I don't
18 know. You don't know.

19 Q. After you had this 30, 35-minute interview
20 with Mr. Lowe, what happened next as far as
21 the hiring process?

22 A. Well, I had to interview -- I interviewed a
23 couple other people. I thought that day

1 that that was particularly going to be the
2 last of the interviews, but individuals
3 kind of came along. I don't know how
4 many. There was another person that came
5 in following his interview, and then I did
6 a phone interview with his brother because
7 his brother was at a conference.

8 Q. The other person came in that same day?

9 A. That same day. And it could have been
10 following. And then I had another
11 interview with a teacher who's on my staff,
12 Martin Dukes, and that was -- he was my
13 last interview, Martin Dukes. He's a
14 social studies teacher at BTW.

15 Q. And you stated that Marvin Lowe had a phone
16 interview with you?

17 A. Yes.

18 Q. And that was after you had had the
19 personal, face-to-face interview with
20 Melvin Lowe?

21 A. Yes.

22 Q. When was Martin Dukes' interview?

23 A. I don't remember the date, but it was

1 Q. So he had it prior to you interviewing him?

2 A. Uh-huh (positive response).

3 Q. Who was actually ultimately hired for that
4 position?

5 A. Ronald Ashley. He was a veteran teacher
6 from Floyd Middle Magnet High School --
7 Junior High School.

8 Q. When was Mr. Ashley interviewed?

9 A. He was interviewed -- I believe he was the
10 first one of the day.

11 Q. Before Melvin Lowe?

12 A. Before Melvin.

13 Q. Okay.

14 A. He could have either been before or after.
15 I was running a little bit behind time that
16 day, so I don't know if he was before or
17 after. I think he was before.

18 Q. Okay. So the day that you interviewed
19 Melvin Lowe, you interviewed Mr. Ashley --

20 A. Right.

21 Q. -- and Melvin Lowe and another individual?

22 A. No, Marvin came the next day on the
23 telephone and then Martin Dukes was the

1 it as well. And that's about it. I got
2 the number and went on because it's very
3 awkward when you're talking to a brother
4 and then a brother, and they're both
5 candidates for the same position. So it
6 was limited. It wasn't a very long
7 conversation.

8 Q. Do you remember when you called Melvin?
9 Was it morning, night?

10 A. It was evening, like about five, six
11 o'clock.

12 Q. So did you call him at his home for
13 Marvin's number?

14 A. Yes, uh-huh (positive response).

15 Q. Did you indicate --

16 A. Home or cell.

17 Q. Did you indicate to Melvin in that phone
18 call that you had already made your
19 decision as to who you were going to
20 recommend for that position?

21 A. No.

22 Q. Did you indicate to Melvin that Marvin had,
23 in fact, applied for that same position?

1 Q. Did you recommend Melvin Lowe for -- Let me
2 back up.

3 Did you ever speak with Jimmy Barker
4 about hiring Melvin Lowe for this position?

5 A. I made my recommendations, talked about
6 those recommendations, and that's it.

7 Q. Okay. Who were your recommendations?

8 A. My first recommendation was Ronald Ashley,
9 and I got him. My second one was a
10 Mr. Johnston, who is at Lee High School
11 now. And my third recommendation was his
12 brother, Mr. Lowe's brother.

13 Q. Okay. Let's back up. Did you interview
14 Mr. Johnston?

15 A. Yes, I did.

16 Q. Okay. When did you interview Mr. Johnston?

17 A. He had to have been before Mr. Lowe.

18 Q. Okay.

19 A. He was one of my first or second interviews.

20 Q. So was the interview in your office?

21 A. Yes.

22 Q. Okay. What did you discuss with Mr. Barker
23 with regard to your recommendations?

1 A. I talked about Mr. Ashley and just kind of
2 getting some background information; that,
3 you know, he has an excellent reputation.
4 He was very impressive in the interview; I
5 mean, extremely organized, poised. He
6 answered all of the questions and was able
7 to elaborate and provide examples as to
8 where he --

9 We have an aviation magnet at BTW.
10 Mr. Ashley has background in the military,
11 and our aviation teacher was up for PEPE
12 evaluation this year, so it was just very
13 impressive to hear about the military
14 experience and how that could apply to what
15 we were doing at BTW. So I shared with him
16 that I was impressed with his organization,
17 with his presence, and with his
18 professionalism in the interview.

19 Q. Did you discuss Mr. Johnston with Jimmy
20 Barker?

21 A. I just discussed that I was impressed with
22 him as well. He had training in logistics,
23 and one of the biggest assignments that an

1 assistant principal has is to do textbooks,
2 inventory, and he kind of made it clear in
3 his interview that he was well prepared to
4 do that. So I didn't really get into
5 details with that because my focus was
6 Ronald Ashley. I wanted him.

7 Q. Did you discuss Marvin Lowe with
8 Mr. Barker?

9 A. The brother?

10 Q. Yes, Marvin.

11 A. Yes, I did discuss him, but more so, you
12 know, this is a guidance counselor, he's
13 12 months, and that I was just very
14 impressed with him as well. Because he did
15 come for a follow-up, face-to-face
16 interview. It was a courtesy. After we
17 had our telephone interview, he just
18 stopped by the school one day to meet me
19 face to face and give me some information
20 in my hand. So I discussed that because I
21 had an opportunity to see him face to face
22 beyond the telephone.

23 Q. Did you ever discuss Melvin Lowe with Jimmy

1 Barker?

2 A. No, I didn't, because that was not one of
3 my choices. He was not one of my choices
4 based on the interviews and the HR around
5 the table.

6 Q. And you stated that Ronald Ashley was your
7 first --

8 A. My first choice.

9 Q. Okay. And he was the one that was hired
10 for the position?

11 A. Hired, uh-huh (positive response).

12 Q. Did Mr. Ashley have any administrative
13 experience prior to BTW?

14 A. He was in the classroom for several years.
15 He would be the designee sometimes when his
16 administrator, Johnny Jefferson, who is
17 deceased now, would leave the building, so
18 he had a lot of leadership experience at
19 Floyd Middle and in the community.

20 Q. Okay. Did you have any conversations with
21 Melvin Lowe with regard to you recommending
22 him for this position?

23 A. I didn't say that -- and one reason why I

1 want to say this clearly is that we cannot
2 tell an applicant that they've been hired.
3 It's just unprofessional. Because what's
4 going to happen if an issue comes up and
5 their qualifications don't match? Because
6 it can happen. Anybody can make mistakes.
7 Human resources, they make the final call.
8 We submit the recommendations, they make
9 the call.

10 So I have to be very careful, because
11 you can get some people really excited: I
12 know I got the job. But you don't want
13 people leaving upset: Well, I know she's
14 already just excluded me from the
15 interview.

16 So I didn't leave him with that
17 impression, but I did leave him like I
18 leave all of my applicants: I'm impressed
19 with your resume, what you've done. You
20 know, you will go very far. But not,
21 you're going to get this job. It's just
22 not professional to do that without
23 following protocol.

1 Q. Had you ever had a conversation with Melvin
2 where you indicated to him that it would be
3 important to exchange phone numbers because
4 you would be working closely together?

5 A. It was important to exchange phone numbers
6 because I have to get all of the contact
7 numbers of the individuals who I've
8 interviewed. You know, you just never know
9 what networking can take place after an
10 interview or when you may have to work with
11 a person in the future. But that's the
12 information I get from everyone. May I
13 have your contact information if I need to
14 contact you in the near future or the
15 future, you know. So...

16 Q. Did you get his contact information at the
17 face-to-face interview, or was this later
18 in a phone call?

19 A. At the face-to-face interview, he provided
20 all of his documents, all of his
21 information.

22 Q. Okay. Other than the conversation that you
23 just spoke of with Jimmy Barker

1 Q. Did you do any follow up with the human
2 resources?

3 A. Other than doing the recommendations?

4 Q. Right.

5 A. They call us.

6 Q. You did the recommendation, and then you
7 said you waited. You didn't do much follow
8 up. I'm just wondering if you did any
9 follow up with --

10 A. I just waited for my phone call.

11 Q. Okay. Did you ever speak to Carolyn Hicks
12 with regard to filling the administrative
13 assistant position in 2005?

14 A. I'm not sure, because I was talking to her
15 the whole time about filling teaching
16 positions because I had openings in musical
17 theater. You know, it could have been in
18 some conversations with her where I was
19 talking about teachers that something could
20 have come up, but, no, I can't say that I
21 did talk to her. I'm not sure. I could
22 have, but I'm just not sure.

23 Q. Did Mr. Barker ever tell you that you had

1 to hire a man or a woman to fill any
2 certain position?

3 A. No. And I even asked Mr. Barker about
4 this. You know, I need somebody. Does it
5 matter? And he said, no. You need to go
6 with the most qualified candidate, you
7 know. We cannot discriminate based on
8 gender or race. And he shared that with
9 me on my IP, so I remember where I was
10 seated when he said that, you know. He
11 said, no, we cannot discriminate. You
12 choose who you want, and we will, if we
13 can, honor that request. Because there
14 were so many schools that needed assistant
15 principals, and so --

16 Q. What was the basis for you even inquiring
17 about that?

18 A. There was no basis for me inquiring about
19 it, but there were several applicants, you
20 know, that were interested in positions.
21 But he made it very clear. And it could
22 have been just something that was inserted,
23 but he made it very clear that, no, you

1 know. Don't look at things like that.

2 Because I am...

3 Q. And I guess what I'm asking you is what
4 gave you the impression that that question
5 needed to be asked to clarify that
6 situation?

7 A. Okay. I've been in other situations, not
8 in Montgomery County, where that has been
9 an issue. I have a friend who is an
10 administrator in another county, and, you
11 know, that's an issue. But it wasn't an
12 issue with Montgomery Public Schools.

13 Q. So your basis for inquiring of Mr. Barker
14 whether you needed to take gender or race
15 or anything else into consideration is
16 based solely on --

17 A. Other experiences.

18 Q. -- other experiences with other counties?

19 A. Right, with other counties.

20 Q. Okay. Do you know if any background or
21 reference check was done with regard to any
22 of the applicants after your interview?

23 A. I'm certain that they went back to just

1 Q. Okay. Had you ever worked with him before?

2 A. I had not, no.

3 Q. That's it.

4 MS. CARTER: I have just a quick
5 clarification.

6 EXAMINATION

7 BY MS. CARTER:

8 Q. You said just for -- because this is our
9 purpose for being here, I just want to
10 clarify this.

11 You said that when you interviewed
12 Melvin Lowe in your office that you had
13 planned for it to be a structured
14 interview, but it didn't turn out like
15 that. Explain to us in more detail what
16 you mean by that.

17 A. Well, when I said that I planned for it to
18 be a structure interview, there was a set,
19 just like with the human resources
20 interview, of questions that I wanted to
21 ask: Organizational skills, interpersonal
22 skills, experience in the magnet school and
23 in the performing and nonperforming arts.

1 And I think we got lost right at the
2 beginning of the interview because -- and I
3 asked him -- you know, I told him at the
4 end, because I didn't want to make him feel
5 like he had talked too much in the
6 interview, so I said, you know, thank you.

7 He said, yes, I've always known that
8 you -- pretty much it's good to take charge
9 of the interview, because people want to
10 hear about everything that you've done. So
11 I heard mostly about Mr. Lowe during the
12 interview, not the questions. My questions
13 weren't being answered.

14 And then after a certain point, if
15 you're halfway through the interview, then
16 as an administrator who is hiring, you're
17 thinking, okay. If I give you a job
18 assignment, it's going to be about you and
19 not about what the task is about. So it
20 moved more so to this is who I am, this is
21 what I've accomplished. And my questions
22 weren't answered, and I gave up pretty
23 much midway. It moved into just

1 conversational, this is what I've done in
2 my lifetime.

3 Q. What do you mean, you gave up midway? You
4 gave up trying to ask your questions?

5 A. Yes, trying to get through the rest of the
6 questions.

7 Q. Was there ever any question or ever a time
8 that Melvin Lowe would have been in your
9 top three picks out of those interviews?

10 A. No, because the candidates were so strong.
11 And I hate to compare Melvin to Marvin, you
12 know, siblings. My parents did that, you
13 know. But they were -- the candidates that
14 I recommended, they were organized. They
15 knew what they were talking about. When
16 you gave them a question, they responded to
17 it and provided examples as to how they
18 would solve these problems, and they would
19 draw from their previous experience. So
20 that is what guided it because you don't
21 know these individuals.

22 I knew nothing about Mr. Ashley other
23 than he was coming from Floyd Middle, but

1 his responses to the questions, this is
2 what our 500 or so kids need at BTW.

3 Q. Did at any time you have a conversation
4 with Jimmy Barker or anybody in central
5 office about Melvin Lowe having a lawsuit
6 or having filed an EEOC charge?

7 A. My first time hearing about this was when I
8 got the call to do the deposition. So I'm
9 floored. I'm shocked, you know.

10 Q. Okay.

11 A. So this is my first time.

12 Q. Thank you.

13 EXAMINATION

14 BY MS. DUGAS:

15 Q. Have you ever spoken to anyone, any third
16 party, Mr. Barker or anyone from HR -- any
17 third party, for that matter -- about
18 Melvin Lowe?

19 A. No. My first time really knowing that he
20 was an administrative applicant was at HR
21 the day he was seated at the table and we
22 were asking -- or the HR officers were
23 asking questions. So, no, I haven't talked

1 about him to anybody, third party.

2 Q. Have you talked to anybody subsequent to
3 the interview with him?

4 A. No, not to -- no.

5 Q. Okay.

6 A. No.

7 MS. CARTER: One other quick
8 question I forgot.

9 EXAMINATION

10 BY MS. CARTER:

11 Q. Do you know anything about Melvin Lowe's
12 mother or a lawsuit she might have had
13 against the school at some point?

14 A. I have not heard that, anything directly
15 about Melvin's --

16 Her last name is Lowe, too?

17 Mrs. Lowe? I haven't --

18 Q. Yes, it is.

19 A. I haven't heard anything about a lawsuit
20 from her, but I do remember her from
21 working as an intern. I interned in the
22 office of student and community support,
23 but there was no personal --

1 Q. Did y'all have any personal issues or
2 personal problems, you and Ms. Lowe?

3 A. No. I worked directly under Stan Cox, who
4 is now in Opelika, and she was just one of
5 the individuals in the office.

6 Q. Okay. Thank you.

7 MS. DUGAS: One question.

8 EXAMINATION

9 BY MS. DUGAS:

10 Q. You said you never heard anything
11 directly. Did you ever hear anything
12 indirectly?

13 A. You know what? When you're in -- and just
14 to be honest, when you're in the public
15 school system, things fly around. So I
16 can't say yes or no, because I don't know
17 what I have heard indirectly in the
18 system. You know, part of the human
19 resource function and the human function is
20 to hear gossip and different things
21 floating around, so you never can say when
22 you haven't or have heard things. But, no,
23 I was not aware or knowledgeable of a